

FILED

MAR 15 2018

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

v.  
Plaintiff, )  
RICHARD McKINNON, )  
DALE CONNOUR, )  
and )  
DELMAR CONNOUR. )  
Defendants. )  
No.

**4:18CR00227 SNLJ/PLC**

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE  
[Theft of Government Property]

Beginning at least by September of 2016 through in or about December 2016, with the exact dates being unknown, in the Eastern District of Missouri, the defendants,

**RICHARD McKINNON,  
DALE CONNOUR,  
and  
DELMAR CONNOUR,**

willfully and knowingly did steal and purloin walnut timber, of the value of more than \$1,000, of the goods and property of the United States, in that the defendants cut or damaged, without authorization, numerous trees from Mark Twain National Forest land, all in violation of 18 U.S.C. § 641.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation in violations of Title 18, United States Code, Section 641 set forth in Count 1 of this Indictment, the defendants, **RICHARD McKINNON, DALE CONNOUR, and DELMAR CONNOUR**, shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s).

2. Subject to forfeiture is a sum of money equal to the value of the property constituting, or derived from proceeds the defendant obtained directly or indirectly as a result of such violation.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: \_\_\_\_\_

A TRUE BILL

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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Gwendolyn E. Carroll  
Assistant United States Attorney